

SECRET

PTQ7579

PAGE 01 SARAJE 03636 01 OF 02 072140Z
 ACTION EUR-00

INFO	LOG-00	AID-00	CEA-01	CIAE-00	CTME-00	INL-00	DODE-00
	SRPP-00	EB-00	E-00	VC-00	FRB-00	H-01	TEDE-00
	INR-00	IO-00	ITC-01	L-00	CAC-00	VCE-00	AC-01
	NSAE-00	NSCE-00	OIC-02	OMB-01	OPIC-01	PA-00	PM-00
	PRS-00	ACE-00	P-00	SCT-00	SP-00	SS-00	STR-00
	TRSE-00	T-00	USIE-00	VO-03	DTC-00	PMB-00	DRL-02
	G-00	SAS-00	/013W				

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 FM AMEMBASSY SARAJEVO
 TO SECSTATE WASHDC IMMEDIATE 2188
 INFO DEPT OF TREASURY WASHDC

CIA WASHDC
 DIRFBI WASHDC
 NSC WASHDC
 DOJ WASHDC
 SECDEF WASHDC
 DIRNSA FT GEORGE G MEADE MD

REVIEW AUTHORITY: Archie Bolster, Senior
 Reviewer

RELEASED IN FULL

S E C R E T SECTION 01 OF 02 SARAJEVO 003636

STATE FOR EUR (BOGUE), D (PITTMAN), P (BRINK), EUR/SCE
 (GREGORIAN), E (SHUB), EB/ESC/ESP (GLASS), S/CT,
 IO/PHO (PEREZ), INL/PC (AIMS), INL/AAE (HARTSHORN)

NSC FOR TEPPER

SECRET

PAGE 02 SARAJE 03636 01 OF 02 072140Z
 TREASURY FOR OFAC DIRECTOR (NEWCOMB), GENCOUNS
 (AUFHAUSER), DAS FOR TERRORISM (ZARATE), E.MEYER AND
 A.CORFIELD

E.O. 12958: DECL 11/06/12
 TAGS: EFIN, ETTC, KVPR, PTER, CVIS, PREL, PGOV, BK
 SUBJECT: TERRORIST FINANCE: BOSNIA'S DIRTY DOZEN

(U) CLASSIFIED BY AMBASSADOR CLIFFORD G. BOND FOR
 REASONS: 1.5 (B) AND (D).

REF: SARAJEVO 3618

SUMMARY AND ACTION REQUEST

1. (S/NF) POST URGENTLY REQUESTS THE ASSISTANCE OF TWO OFAC COUNTER-TERRORISM SPECIALISTS FOR A PERIOD OF SIX WEEKS TO DEVELOP FORENSIC FINANCIAL EVIDENCE IN CONNECTION WITH THE OPERATION OF ISLAMIC CHARITIES IN BOSNIA. POST BELIEVES THAT AT LEAST A DOZEN ISLAMIC NGOS ARE CURRENTLY INVOLVED IN PROVIDING FINANCIAL SUPPORT TO KNOWN TERRORIST ORGANIZATIONS. IF SUFFICIENT EVIDENCE CAN BE ACCUMULATED LINKING THESE NGOS TO TERRORIST GROUPS, WE HAVE ONLY A LIMITED WINDOW OF OPPORTUNITY TO SHUT THE NGOS DOWN BEFORE NEW -- AND POSSIBLY LESS COOPERATIVE -- GOVERNMENTS ARE PUT IN PLACE IN BIH. THE EMBASSY'S COOPERATING PARTNER, THE FINANCIAL POLICE, HAS ALREADY CLOSED TWO ISLAMIC NGOS, AL-HARAMAYN ISLAMIC FOUNDATION AND GLOBAL RELIEF FOUNDATION AND HAS ASSURED US THEY INTEND TO PROSECUTE THESE TWO CASES. OFAC PERSONNEL
SECRET

PAGE 03 SARAJE 03636 01 OF 02 072140Z
WOULD PROVIDE THE FINANCIAL INVESTIGATIVE CAPACITY TO BUILD STRONG PROSECUTORIAL CASES, GIVING NEEDED LEVERAGE FOR THE FINANCIAL POLICE TO MOVE AGAINST THE OTHER NGOS AS WELL. OUR REQUEST IS SUPPORTED BY THE OFFICE OF THE HIGH REPRESENTATIVE (OHR) AND SFOR, BOTH OF WHOM HAVE BEEN ESSENTIAL PARTNERS IN POST COUNTER-TERRORISM EFFORTS. END SUMMARY.

DIRTY DOZEN

2. (S/NF) THE FEDERATION FINANCIAL POLICE (FP) HAVE PROVIDED US WITH A LIST OF TWELVE DIFFERENT ISLAMIC CHARITIES (REFTEL) THAT THEY HAVE TARGETED FOR INVESTIGATION AND POTENTIAL PROSECUTION. THEY INCLUDE: BENEVOLENCE INTERNATIONAL FOUNDATION (BIF), GLOBAL RELIEF FOUNDATION (GRF), AL-HARAMAYN ISLAMIC FOUNDATION, ACTIVE ISLAMIC YOUTH ORGANIZATION, AL-FURQAN, SAUDI HIGH COMMISSION FOR RELIEF, AL-HARAMAYN AL AQSA, HUMAN APPEAL INTERNATIONAL, HUMAN RELIEF INTERNATIONAL, INTERNATIONAL ISLAMIC RELIEF ORGANIZATION, NEDWAH AND TAIBAH INTERNATIONAL AID ASSOCIATION. THE FIRST SIX NGOS ARE ON THE EMBASSY'S LIST OF HIGHEST PRIORITIES IN TERMS OF OUR OWN EFFORTS TO SHUT DOWN NGOS WITH LINKS TO KNOWN TERRORIST ORGANIZATIONS.

LACK OF TRAINED PERSONNEL

SECRET

PAGE 04 SARAJE 03636 01 OF 02 072140Z
FINANCIAL POLICE AND BANKING REGULATORS) HAVE EXTENDED THEIR COOPERATION TO BLOCK THE ASSETS OF SUSPECT NGOS LISTED UNDER E.O. 13224, CLOSING THEM DOWN HAS BEEN ANOTHER MATTER. UNDER BOSNIA'S COMPLEX LEGAL SYSTEM, PERMANENT CLOSURE OF THESE ORGANIZATIONS WILL LIKELY REQUIRE DETAILED FORENSIC FINANCIAL EVIDENCE TO BUILD SOLID CASES AGAINST THEM. AS NOTED REFTEL, GOVERNMENT AUTHORITIES DO NOT HAVE THE CAPABILITIES TO DEVELOP SUCH EVIDENCE. THE USG INTENDS TO PROVIDE THE FINANCIAL POLICE, TAX AUTHORITIES, BANKING REGULATORS, PROSECUTORS AND JUDGES WITH TRAINING TO IMPROVE THEIR FINANCIAL INVESTIGATIVE CAPACITY. IN THE MEANTIME, HOWEVER, WE NEED EXPERTISE ON THE GROUND NOW TO DEVELOP THIS EVIDENCE. WE BELIEVE OFAC PERSONNEL COULD BEST MEET THOSE NEEDS.

MAINTAINING MOMENTUM

4. (S/NF) BRINGING OFAC EXPERTISE TO BEAR ON THE PROBLEM IS URGENT, AS THERE IS NO GUARANTEE THAT WE WILL HAVE THE SAME LEVEL OF COOPERATION ON COUNTER-TERRORISM WHEN BOSNIA'S NEW GOVERNMENTS COME INTO

SECRET

SECRET PTQ7580

PAGE 01 SARAJE 03636 02 OF 02 072141Z
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PLACE. WHILE THE WINDOW OF OPPORTUNITY IS STILL OPEN,
POST BELIEVES STRONGLY WE SHOULD WORK WITH LOCAL
AUTHORITIES TO SHUT DOWN AS MANY OF THESE NGOS AS
POSSIBLE. (NOTE: ONLY 10 NGOS REMAIN OPEN, AS THE
FEDERATION FINANCIAL POLICE JUST CLOSED AL-HARAMAYN
ISLAMIC FOUNDATION AND GLOBAL RELIEF FOUNDATION --
SEE REFTEL. END NOTE.) THE FINANCIAL POLICE HAVE
ASSURED US THEY WILL MOVE TO PROSECUTE CASES AGAINST
THESE AND OTHER SUSPECT ISLAMIC NGOS. WE ARE
CONCERNED, HOWEVER, THAT AS JUDICIAL AUTHORITIES MOUNT
THEIR CASES, THEY WILL NEED MORE DETAILED AND
COMPREHENSIVE EVIDENCE TO ENSURE THESE ORGANIZATIONS
ARE SHUT DOWN PERMANENTLY. THAT KIND OF EVIDENCE CAN
COME ONLY FROM TRAINED FINANCIAL INVESTIGATORS.

ACTION REQUEST

5. (S/NF) POST REQUESTS THE ASSISTANCE OF TWO FULL-
TIME OFAC COUNTER-TERRORISM FINANCE SPECIALISTS OVER A
SIX WEEK PERIOD TO DEVELOP FORENSIC FINANCIAL EVIDENCE
AIMED AT PERMANENTLY CLOSING ISLAMIC NGOS INVOLVED IN
SUPPORTING TERRORIST GROUPS. OUR REQUEST IS SUPPORTED
SECRET

PAGE 03 SARAJE 03636 02 OF 02 072141Z
BY HIGH REPRESENTATIVE PADDY ASHDOWN, WHO RAISED THE

UNCLASSIFIED U.S. Department of State Case No. F-2009-08426 Doc No. C17589780 Date: 10/11/2012
SUBJECT WITH [Case 1:09-cr-01570-GEB Document 3874-14 Filed 12/01/17 Page 5 of 5](#)
TO WASHINGTON. IN ADDITION, SFOR, WHICH HAS BEEN AN
ESSENTIAL PARTNER IN THE MISSION'S COUNTER-TERRORISM
EFFORTS, FULLY SUPPORTS THIS REQUEST. POST WOULD
APPRECIATE DEPARTMENT'S RESPONSE AT THE EARLIEST
OPPORTUNITY AS WE WISH TO CAPITALIZE FULLY ON THE
COOPERATIVE LOCAL SPIRIT THAT EXISTS TODAY, BUT MAY
DISAPPEAR TOMORROW.

BOND

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